

REMARKS

Claims 1-6, 9-14 and 17-22 remain in this application. Claims 1, 9 and 17 were amended to better define the claim language and to address objections raised by the Examiner. Claims 7-8, 15-16, and 23-32 were canceled without prejudice. No new matter has been introduced as a result of the amendments.

Claims 25-32 were rejected under 35 U.S.C. §101 as being directed to non-statutory subject matter. Consequently Applicant has canceled claims 25-32. Withdrawal of this rejection is respectfully requested.

Claims 1-32 of the present application were rejected by the Examiner under 35 U.S.C. §102(e) as being anticipated by *Kurachi* (U.S. Patent No. 6,092,035). Applicant respectfully traverses this rejection. Favorable reconsideration is respectfully requested.

Specifically, *Kurachi* does not disclose “correcting said internal information associated with said electronic document at each level of the hierarchy of the document structure in response to an operation performed by the user in accordance with the internal information displayed on the display, wherein said correction step corrects the internal information associated with said electronic document by adding, removing, or modifying internal information” as recited in claim 9 and similarly recited in claims 1 and 17.

The disclosure in *Kurachi* teaches a morphological analysis (FIG. 8) wherein source text is converted into a string of morphemes, and a grammatical and sentence analysis is subsequently performed (col. 11, lines 18-49). A dependent structure of the sentence is next determined, where element types are identified (col. 11, lines 50-54, col. 12, lines 6-25). Each of these steps must be performed in order to determine a pivot language structure (col. 11, lines 11-13). From the pivot language structure, *Kurachi* generates a structure tree where word orders are assigned according to rule data (col. 13, lines 3-7). When the structure tree encounters “vagueness”, the structure tree generates a plurality of sentence structures and the user selects from a limited list of sentence “candidates” that the user deems the most appropriate (col. 14, lines 12-51).

In contrast, the presently claimed invention allows users to view and to actively modify structural information at each hierarchical level. Furthermore, users can correct internal information by adding, removing or modifying internal information. These features provide greater flexibility than those disclosed in *Kurachi*, where the lower hierarchical structures are predetermined by given rules, discussed above. Under the disclosure of *Kurachi*, once analyzed text exceeds a preset rule, an error flag is generated without further user input (see FIG. 5, 7, and 22). Also, users under *Kurachi* are not capable of "adding removing or modifying" internal information at each hierarchical level – the only user interaction disclosed in *Kurachi* is when multiple sentence structures are generated from a preset morphological group, and a user must select which of these generated structures are correct (col. 14, lines 35-48). Indeed, *Kurachi* discloses that the structures are such that they remain "faithful" to a predetermined meaning (col. 14, lines 53-61; see FIG. 13). Thus any modification made by users at lower hierarchical levels would destroy subsequent analysis being made in the teaching of *Kurachi*.

Furthermore, claim 1 recites, among other things, "correction means for correcting said internal information", wherein the specification in the present disclosure teaches a tagging configuration where users may customize or correct defined or undefined elements within a text using multiple hierarchical levels (see specification, pages 107-122), which materially differs from the disclosure in *Kurachi*. The "broadest reasonable interpretation" that an examiner may give means-plus-function language is that statutorily mandated in paragraph six. 35 U.S.C. 112, sixth paragraph states that a claim limitation expressed in means-plus-function language "shall be construed to cover the corresponding structure described in the specification and equivalents thereof." Accordingly, the PTO may not disregard the structure disclosed in the specification corresponding to such language when rendering a patentability determination (see MPEP 2181).

In light of the above, Applicant respectfully submits that claims 1-6, 9-14 and 17-22 of the present application are both novel and non-obvious over the art of record. Accordingly, Applicant respectfully requests that a timely Notice of Allowance be issued in this case. If any fees are due in connection with this application as a whole, the Examiner is authorized to deduct such fees from deposit account no. 02-1818. If such a deduction is made, please indicate the attorney docket number (0112857-068) on the account statement.

Respectfully submitted,

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BY

A handwritten signature in black ink, appearing to read "Peter Zura", is written over a horizontal line.

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